

**Federal Defenders
OF NEW YORK, INC.**

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November 4, 2020

BY ECF

The Honorable Judge Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

**RE: United States v. Desirae Schneider
20 Cr. 325 (SHS)**

Dear Judge Stein,

I write to request a temporary modification to Desirae Schneider's bail conditions in the above-captioned case to allow Ms. Schneider to drive to Astoria, Queens and stay there overnight from Saturday, November 7, 2020 through Sunday, November 8, 2020. Pretrial services and the Government do not object to this request.

On March 16, 2020, Ms. Schneider was presented in Magistrate Court. The following bail conditions were set and subsequently met:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pre-trial supervision and mental health treatment as directed; surrender of travel documents with no new applications and travel restricted to the Southern District of New York; no contact with the alleged victim outside the presence of counsel; surrender keys to the complainant's home; continued employment; no "dark web" use; no possession of firearms/destructive devices/other weapons; and GPS monitoring.

On June 22, 2020, Magistrate Judge Gorenstein granted Ms. Schneider's request for a temporary bail modification to allow her to travel to Milford, Connecticut from Saturday, June 27 through Sunday, June 28 to attend a small outdoor wedding. Ms. Schneider attended the wedding without incident. On July 29, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to enable her to travel to Illinois to visit her family for one week in August 2020. Ms. Schneider planned this trip in consultation with her pretrial services officer. On August 6, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to enable her to drive to Milford, Connecticut for a small birthday gathering with friends on

August 9, 2020. On September 18, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to enable her to drive to Milford, Connecticut to visit friends on September 20, 2020. On October 16, 2020, the Court granted Ms. Schneider's request for a temporary bail modification to drive to Astoria, Queens to visit friends on that day. Since the start of this case, Ms. Schneider has remained in consistent compliance with the conditions of her release.

Ms. Schneider now respectfully requests a temporary bail modification to enable her to drive to Astoria, Queens on Saturday, November 7, 2020 and spend the night through Sunday, November 8, 2020. The complainant in this case will not be there.

Respectfully submitted,

/s/
Marne Lenox
Assistant Federal Defender
(212) 417-8721

Dated: New York, New York
November 4, 2020

SO ORDERED:


HONORABLE SIDNEY H. STEIN
United States District Judge

cc: Rebecca Dell, Assistant U.S. Attorney (by ECF)
 Jonathan Lettieri, Pre-Trial Services Officer (by email)